

## **U.S. Department of Justice**

United States Attorney Southern District of New York

Southern District of New York 26 Federal Plaza, 37th Floor New York, NY 10278

March 28, 2025

## **BY ECF**

The Honorable Laura Taylor Swain United States District Judge United States District Court for the Southern District of New York 500 Pearl Street, New York, New York 10007

Re: <u>United States</u> v. <u>Renwick Haddow</u>, 19 Cr. 340 (LTS)

Dear Judge Swain:

The Government respectfully writes on behalf of the parties to request that the defendant's sentencing currently scheduled for April 23, 2025 be adjourned for approximately 90 days to facilitate the defendant's ongoing cooperation in the Government's efforts to forfeit and recover assets in foreign jurisdictions. Specifically, the defendant continues to attempt to voluntarily liquidate or otherwise transfer real property or other assets in foreign jurisdictions, including Morocco and the Bahamas, among others. The Government is mindful of the need for an expedient resolution of this matter. However, the defendant's facilitation of this complex asset recovery process with domestic and foreign counsel—and the potential recoveries of several million dollars' of assets toward forfeiture and restitution for the victims—would be more difficult and time consuming if the defendant were to be sentenced to a prison term at this particular time. Any such recoveries achieved by the defendant would also be relevant for the Court's consideration of any motion made under U.S.S.G. § 5K1.1. Accordingly, the Government requests all corresponding sentencing submission and Presentence Report deadlines to be adjourned by approximately 90 days.

Respectfully submitted,

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